

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 22-CR-20209-MOORE/LOUIS

UNITED STATES OF AMERICA

vs.

RICARDO RODRIGUEZ-OTERO,

Defendant.

FACTUAL PROFFER

The United States of America and Ricardo Rodriguez-Otero ("Defendant") agree that had this case gone to trial, the United States would have proven the following facts beyond a reasonable doubt:

On three separate occasions, Defendant sold a law enforcement confidential source ("CS") over two kilograms of cocaine.

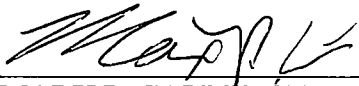
On or about September 14, 2021, CS called Defendant to purchase one kilogram of cocaine. They agreed to meet the next day so CS could purchase the one kilogram of cocaine for \$30,000. Defendant told CS to meet him at a residence ("Residence") in Miami, Florida. On or about September 15, 2021, Defendant and CS met in the driveway of Residence for the transaction. CS exited his vehicle and entered the passenger side of Defendant's vehicle. CS handed Defendant money for the cocaine and Defendant gave CS one kilogram of cocaine. This controlled buy was audio and video recorded and observed by law enforcement. Defendant knowingly possessed the controlled substance cocaine with the intent to distribute it and did in fact knowingly distribute it.

The information contained in this proffer is not a complete recitation of the facts and circumstances of this case, but the parties agree it is sufficient to prove Count 2 of the Indictment

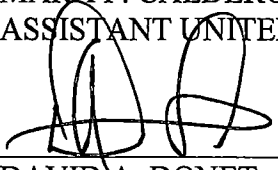
beyond a reasonable doubt.

JUAN ANTONIO GONZALEZ
UNITED STATES ATTORNEY

Date: 9/7/22

By: 
MARX P. CALDERÓN
ASSISTANT UNITED STATES ATTORNEY

Date: 9/7/22

By: 
DAVID A. DONET
ATTORNEY FOR DEFENDANT

Date: 9/7/22

By: 
RICARDO RODRIGUEZ-OTERO
DEFENDANT